

BROOKHAVEN NATIONAL LABORATORY

SBMS Interim Procedure

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Title: Integrated Management Review

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Management System: Occupational Safety and Health

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Applicability: Plant Engineering Division, Central Fabrication Services Division and Collider-Accelerator Department

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1. Purpose

- 1.1. This procedure is designed to ensure that senior management periodically reviews occupational safety and health (OSH) and environmental performance, both qualitatively and quantitatively, for the purpose of identifying key improvement opportunities. This procedure can be satisfied by either performing one joint OSH and environmental performance management review or separate management reviews.

2. Definitions

- 2.1. Refer to the Definitions contained in OHSAS 18001 Clause 3.

3. Responsibilities

- 3.1. The OSH Management System Representative is responsible for ensuring their Department's/Division's Integrated Management Review is executed each year.

3.2. For each BNL Department or Division, the personnel who hold the following BNL roles are responsible for participating in the Integrated Management Review:

- Associate Laboratory Director (ALD)
- Assistant Laboratory Director for ESHQ
- Department Chair or Division Manager
- Department/Division ESHQ Staff
- Worker Representatives
- BNL ESHQ Directorate Division Managers
- Facility Support Representative
- Environmental Compliance Representative
- The Management System Stewards for the following management systems:
 - Worker Safety and Health Management System
 - Integrated Assessment Program
 - Occupational Medicine
 - Facility Safety
 - Emergency Response Services
 - Work Planning and Control
 - Environmental Management System
 - Integrated Planning

4. Scope

- 4.1. Overview of the OSH and environmental management systems within the organization.
- 4.2. Review of OSH and EMS related assessments.
- 4.3. Discussion of stakeholder concerns.
- 4.4. Review of OSH and EMS improvements.
- 4.5. Review of injury/illness reduction and pollution prevention initiatives.
- 4.6. Review of OSHMS and EMS performance.
- 4.7. OSH objectives, targets and performance measures.
- 4.8. Financial investments.
- 4.9. Senior management questions.

5. Procedure

- 5.1. Minutes are required. Specifically the decisions and recommendations made by senior management must be recorded.
- 5.2. Evaluate completeness of aspects list, and evaluate completeness of hazards list. Review

- activities that can impact environment
 - the organization's significant aspects
 - activities that can cause injuries and illnesses
 - the organization's hazards
- 5.3. Summarize OSH and EMS related assessments and results but emphasize the corrective actions that were implemented to prevent recurrence. Review:
- nonconformances
 - internal OSH Audit
 - internal EMS Audit
 - external OSH and EMS Audits
- 5.4. For stakeholder concerns, review issues and actions, if any, that are related to:
- activists
 - community
 - regulators
 - unions
- 5.5. For OSH and EMS improvements, focus on new training, aspects analyses, hazard analyses, improved documentation, and safety or environmental protection initiatives, etc. Show correlations, if any, to improvement in performance.
- 5.5.1. Summarize improvement and/or compliance initiative that the organization will be undertaking that has been designed to achieve the organization's targets, and ultimately the relevant BNL objectives.
- 5.5.2. Focus on the change or actions that were implemented to attain compliance with regulatory requirements, and improve the OSH and/or environmental management systems.
- 5.5.3. For injury/illness reduction and pollution prevention initiatives, identify initiatives implemented and results, or planned initiatives.
- 5.6. For review of OSH and environmental management system performance EMS, present OSH and EMS data (as applicable). For example:
- injury/illness rates and trends
 - Tier 1 performance
 - OSH related critiques
 - occurrence reports
 - injury/illness rates and trends at other DOE laboratories
 - SPDES discharge monitoring results
 - groundwater monitoring data
 - air emissions both radiological and non-radiological
 - waste volumes
 - spills and occurrence reports
 - soil, flora, fauna, as applicable injury/illness rates and trends
- 5.7. For OSH and EMS objectives, targets and performance measures, review current year objectives/measures:

- OSH and EMS improvement targets completed
- implementation of /milestones for safety or environmental related recommendations from standing or ad hoc safety committees
- implementation of /milestones for prior year's Integrated Management Review
- compliance with regulatory requirements
- implementation of injury/illness reduction and pollution prevention initiatives
- facility specific performance measures

5.7.1. Be sure to translate the high-level objectives to organization-level *targets* that are pragmatic and specific to a particular facility, area or job.

5.7.2. For performance measures, identify the indicators that can and will demonstrate whether the organization successfully achieved the target, and ultimately the objective.

5.8. For costs, review:

- OSH and EMS management system maintenance and/or implementation costs
- costs associated with injuries/illnesses
- costs associated with cleanup of
- costs associated with pollution prevention and safety improvement initiatives
- fines/violations
- monitoring costs
- specialized support (Du Pont consultants, ECRs, etc.)
- lab-wide initiatives

5.9. Senior managers must answer the following questions for the purpose of identifying improvement actions and assigning responsibility and resources.

5.9.1. Are the occupational safety and health and environmental management systems effective in achieving policy commitments?

If yes, record the decision; if no, record recommendations.

5.9.2. Are the occupational safety and health and environmental management systems effective in achieving the objectives, targets and performance measures?

If yes, record the decision; if no, record recommendations.

5.9.3. Are the occupational safety and health and environmental management systems adequate in terms of:

- Identifying significant aspects, hazards and impacts?
- Resource allocation?
- Information systems?
- Organizational issues – staff expertise; procedural requirements?

If yes, record the decision; if no, record recommendations.

5.9.4. Are the objectives, targets and performance measures for these management systems suitable in terms of:

- Injuries /illnesses and environmental impacts?
- Concerns of stakeholders?
- Current and future regulatory requirements?
- Business interests; technological capability?
- Internal organizational or process changes?
- Should additional objectives, targets or performance measures be established?

If yes, record the decision; if no, record recommendations.

5.9.5. Recommended revisions to:

- ESSH policy and commitments?
- Objectives, Targets and Performance Measures?
- Occupational safety and health or environmental related management systems?

If yes, record the decision; if no, record recommendations.